

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE MICROSOFT BROWSER  
EXTENSION LITIGATION

No. 2:25-cv-00088-RSM

This Document Relates to:  
ALL ACTIONS

STIPULATED MOTION TO EXTEND  
DEADLINE FOR FILING CONSOLIDATED  
COMPLAINT AND ORDER

Plaintiffs and Defendant Microsoft Corporation, by and through their undersigned counsel, hereby respectfully move this Court to enter an Order extending the deadline for Plaintiffs to file a Consolidated Complaint by thirty (30) days, up to and including May 2, 2025. The undersigned certify that the parties met and conferred prior to filing this Motion. As set forth below, good cause exists for the parties' requested extension.

1. Pursuant to the Court's Order on March 3, 2025, the deadline for Plaintiffs to file a Consolidated Complaint is within 30 days of appointment of Interim Class Counsel (Dkt. No. 28).

2. On March 3, 2025, the Court appointed Interim Class Counsel (Dkt. No. 29), making the Consolidated Complaint due on or before April 2, 2025.

3. On March 24, 2025, the Court granted the Parties' Stipulated Motion to Extend Deadlines for Rule 26(f) Conference and Initial Disclosures (Dkt. No. 31).

1           4.       On account of the complexity of the legal claims and factual matters at issue in  
2 the Consolidated Complaint—including the analysis of numerous Plaintiffs’ factual allegations  
3 and the laws of multiples states—Plaintiffs seek an extension of thirty (30) days until May 2,  
4 2025 in order to prepare the Consolidated Complaint.

5           5.       The parties met and conferred and agreed to mutually extend the deadline for the  
6 filing of Plaintiffs’ Consolidated Complaint by thirty (30) days.

7           6.       If granted, this extension would in turn also extend the deadlines for subsequent  
8 filings as well. Pursuant to Dkt. No. 28, Microsoft’s deadline for responding to the  
9 Consolidated Complaint is within 45 days after its filing; also, if Microsoft responds by a  
10 motion to dismiss, the deadline for Plaintiffs’ opposition to the motion to dismiss is within 45  
11 days of the motion, and the deadline for Microsoft’s reply is within 21 days of the opposition  
12 (Dkt. No. 28).

13           THEREFORE, the parties respectfully request that the Court enter the attached  
14 proposed order extending the deadline for Plaintiffs to file the Consolidated Complaint by  
15 thirty (30) days to May 2, 2025.

I certify that this memorandum contains  
335 words, in compliance with the Local  
Civil Rules

16  
17  
18 Dated: March 25, 2025

By: Derek W. Loeser  
Derek W. Loeser, WSBA #24274  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3400  
Seattle, WA 98101-3268  
Telephone: (206) 623-1900  
Facsimile: (206) 623-3384  
dloeser@kellerrohrback.com

Jason T. Dennett, WSBA #30686  
jdennett@tousley.com  
TOUSLEY BRAIN STEPHENS PLLC  
1200 Fifth Avenue, Suite 1700  
Seattle, Washington 98101  
Telephone: (206) 682-5600

Gary M. Klinger (*pro hac vice*)  
MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC  
227 W. Monroe Street, Suite 2100  
Chicago, IL 60606  
Telephone: (866) 252-0878  
gklinger@milberg.com

Adam E. Polk (*pro hac vice*)  
GIRARD SHARP LLP  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
apolk@girardsharp.com

***Interim Class Counsel***

Dated: March 25, 2025

By: Fred B. Burnside

Fred B. Burnside, WSBA #32491  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
E-mail: fredburnside@dwt.com

George Gordon (admitted *pro hac vice*)  
Julia Chapman (admitted *pro hac vice*)  
Caroline Power (admitted *pro hac vice*)  
DECHERT LLP  
Cira Centre, 2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 994-4000  
george.gordon@dechert.com  
julia.chapman@dechert.com  
caroline.power@dechert.com

Gregory Chuebon (admitted *pro hac vice*)  
DECHERT LLP  
1095 6th Ave  
New York, NY 10036  
Telephone: (212) 698-3500  
greg.chuebon@dechert.com

***Attorneys for Defendant Microsoft Corporation***

**ORDER**

This matter comes before the Court on the Parties' Stipulated Motion to Extend Deadline for Filing the Consolidated Complaint and [Proposed] Order. The Court GRANTS the Parties' Stipulated Motion and establishes the following schedule:

- The deadline for filing the Consolidated Complaint is extended by thirty (30) days to May 2, 2025;
- Microsoft will respond to the Consolidated Complaint within 45 days after the filing of Plaintiffs' Consolidated Complaint;
- If Microsoft responds by way of motion to dismiss, Plaintiffs shall file an opposition to the motion to dismiss within 45 days of the motion; and Microsoft shall have 21 days to file a reply.

IT IS SO ORDERED.

DATED this 25<sup>th</sup> day of March, 2025.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE